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Federal Public Defender
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Counsel for Defendant RAVEN
Specially Appearing for Defendant BLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-07-70489 MAG
)	
Plaintiff,)	MOTION AND PROPOSED ORDER
)	FOR TEMPORARY MODIFICATION
v.)	OF BAIL CONDITIONS PERMITTING
)	DEFENDANTS TO TRAVEL TO LAW
Patrice RAVEN and Jeanette)	VEGAS
BLAND,)	
)	
)	Next Date: October 31, 2007 (Judge
Defendants.)	Chen)
)	Time: 9:30 a.m.
)	Court: Honorable Joseph C. Spero

Defendants Raven and Bland hereby respectfully request this Court to issue an order modifying their bail conditions, which would permit the defendants to travel to Las Vegas for plans they arranged prior to their arrests on this matter. The proposed dates of travel are November 1, 2007 through November 4, 2007. United States Pretrial Services Officer Hence Williams has been contacted by defense counsel about this request, and has no objection to the request. USPSO Williams will be provided with an itinerary detailing flight and hotel information. The defendants will be back in the district no later than the evening of November 4, 2007.

Assistant United States Attorney Allison Marston Danner has been contacted by defense

counsel, and has no objection to the request.

WHEREFORE, defendants Raven and Bland respectfully request this Court to grant the temporary modification, and allow the defendants to travel to Las Vegas between November 1, 2007 and November 4, 2007.

IT IS SO STIPULATED

DATED: 10/22/07

/S/
ELIZABETH M. FALK
Assistant Federal Public Defender

DATED: 10/22/07

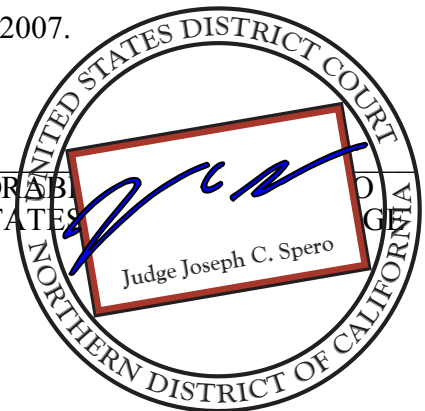
/S/
ALLISON MARSTON DANNER
Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE SHOWN, it is hereby ORDERED that the bail conditions of Defendants PATRICE RAVEN and JEANETTE BLAND be temporarily modified to permit them to travel to Las Vegas on Thursday, November 1, 2007, provided that the defendants return to the Northern District of California no later than the evening of November 4, 2007.

Dated: 10/23/7

THE HONORABLE
UNITED STATES



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